

MODERN SLAVERY ACT STATEMENT

This is the modern slavery and human trafficking statement of Core Assets, being Core Assets Group Limited and all its subsidiaries and UK group companies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and has been adopted by all companies in the Group as their respective modern slavery and human trafficking statement for the financial year ending 31 December 2016. This includes Foster Care Associates Limited and Key Assets The Children’s Services Provider Limited together with various other Group companies. A full list of such companies is held at Core Assets’ registered office in accordance with the Act.

This statement sets out the steps taken by Core Assets Group Limited and other relevant Group companies to prevent modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

Our organisation has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of our business dealings and relationships. This involves implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains. We are committed to improving our practices to combat modern slavery and human trafficking.

OUR STRUCTURE AND BUSINESS

Our organisation is a provider of children’s services in the social care sector. Core Assets Group Limited is the parent company, whose registered office is situated in England. It encompasses a number of Group companies which deliver fostering as well as children and family services. Such companies include:

- Foster Care Associates Limited – an independent fostering agency operating within the UK.
- Key Assets The Children’s Services Provider Limited – whose registered office is in England, and has a number of operations overseas to deliver fostering services internationally.

There are various other subsidiaries within the Group which provide fostering as well as children and family services to make a real and lasting difference for children and young people’s lives.

OUR SUPPLY CHAINS

Throughout our supply chain, we are committed to high ethical standards, promoting safe and fair working conditions and responsible management of social issues. We believe we have a responsibility and opportunity to encourage sustainable business practices as well as inclusion and diversity amongst our suppliers.

Our supply chains include contractors and consultants who provide various products and services such as:

- Social work services.
- Information technology suppliers providing equipment such as computers, laptops and mobile phones as well as software.

- Facilities management such as cleaning and security services.
- Suppliers of materials such as stationery and office equipment.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere in our supply chains.

In addition to this, we have a number of appropriate policies such as:

- Human Resources related documentation including Recruitment, Whistle-blowing and Grievance Policies.
- Risk Management Policy to clarify the process for identifying, analysing and evaluating a risk.
- Safeguarding Policy to ensure that vulnerable people are not at risk.
- Health and Safety Policy to demonstrate acceptable working conditions.

These policies encourage staff to report any wrongdoing which extends to human rights violations like modern slavery. All reports will be fully investigated and appropriate remedial actions taken.

DUE DILIGENCE PROCESSES

Within our organisation, we have robust recruitment processes which include undertaking document checks on candidates prior to employment to evidence they are allowed to work in the UK, performing appropriate reference checks and ensuring that staff are paid directly into a suitable personal bank account.

In relation to our supply chains, we have reviewed our contractual arrangements with current and prospective suppliers to ensure they comply with the Act. This involves placing obligations upon suppliers to conduct regular modern slavery risk assessments within their own supply chains, implement appropriate controls to prevent modern slavery, and notify our organisation immediately if any supplier becomes aware of any modern slavery within their supply chains.

RISK ASSESSMENT AND MANAGEMENT

As part of our initiative to identify and mitigate risk, we have:

- Acknowledged the need to map our supply chains to identify the parts of the supply chains where the risks are most severe or most likely to occur.
- Recognised that processes should be adopted to identify and assess potential risk areas in our supply chains. This involves consideration of the geographical location where our organisation operates as well as assessing whether specific parts of the business or particular relationships or transactions are vulnerable to modern slavery and human trafficking.

Our strategy for managing risks in relation to modern slavery and human trafficking are achieved through:

- A regular sub-committee meeting (for risk and compliance) consisting of our Executive Directors to oversee risk management;
- A corporate risk register to record all risks with reporting of extreme/high risks being escalated to sub-committee (for risk and compliance);
- Six monthly reviews of the corporate risk register; and
- Using a risk management portal for staff to report strategic and operational risks.

RESPONSIBILITIES FOR COMPLIANCE

The directors of each business area are responsible for compliance in their respective departments and for their supplier relationships. Given the complexity and changing nature of this issue, we have formalised internal governance of modern slavery and human trafficking at both operational and senior leadership levels.

To demonstrate the organisation's commitment to combat modern slavery and human trafficking in its business and supply chains, we shall monitor and enforce compliance with our Anti-Slavery and Human Trafficking Policy. We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal;
- Human Resources;
- Finance; and
- Procurement.

We recognise that overall accountability for risk management and internal controls are the responsibility of the Board. All risks that are identified as extreme or high risk are escalated to the sub-committee for risk and compliance, with exceptions reported to the Board.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are mindful that appropriate training should be introduced and delivered to our staff. This will provide our employees with knowledge on how to identify exploitation and modern slavery as well as the process for reporting suspected cases.

We also encourage our business partners to arrange training for their staff, suppliers and providers.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

We understand that modern slavery is not static, and will ensure that our organisation continues its leading approach to mitigating this risk in the year ahead.

In order to assess the effectiveness of the measures taken by our organisation, we will be reviewing the following key performance indicators and reporting on them in future modern slavery statements:

- Staff training levels;
- Actions taken to strengthen supply chain auditing and verification;
- Steps taken to raise awareness of modern slavery and human trafficking throughout supply chains; and

- Investigations undertaken into reports of modern slavery and remedial actions taken in response.

FURTHER STEPS

Following a review of the effectiveness of the measures we have adopted this year to ensure that there is no modern slavery or human trafficking in our supply chains, we intend to take the following further steps:

- Compiling a Supplier Code Of Conduct in which we set out our expectations of suppliers in respect of their compliance with the Act; and
- Producing a Procurement Policy in which we detail relevant requirements relating to the process of acquiring goods and services.

We are committed to continual improvement and will take active measures to combat modern slavery and human trafficking in our business and supply chains.

This statement is made pursuant to section 54(1) of the Act and constitutes our Group's modern slavery and human trafficking statement for the financial year ending 31 December 2016.

This statement was approved by the Boards of Core Assets Group Limited, Foster Care Associates Limited, Key Assets The Children's Services Provider Limited and relevant subsidiary companies.

Signature:



Martin Cockburn

Chairman for Core Assets Group Limited, Foster Care Associates Limited, Key Assets The Children's Services Provider Limited and relevant subsidiary companies.

Date: 31 January 2017